

EXHIBIT 116

Declaration of Camille Wilson

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF CAMILLE WILSON

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I, Camille Wilson, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I received my Bachelor of Arts from The University of North Carolina at Chapel Hill (“UNC-Chapel Hill” or the “University”) in 2007, and a Master in School Counseling from North Carolina Central University. I am currently an Associate Director of College Readiness at the Emily Krzyzewski (“Emily K”) Center, a nonprofit organization in Durham, North Carolina that works to help low-income students access and succeed in higher education.

2. I am a Black woman and a native North Carolinian. Most of my education was in Wake County Schools, which were very diverse. However, in ninth grade, I attended school in Pitt County, which was much less diverse than Wake County. It was a culture shock moving from Wake to Pitt County.

3. In high school, I started noticing that the higher-achieving students and the student leaders were all going to UNC-Chapel Hill, and that became my goal as well. After junior year, I attended Project Uplift, a program that invites high-achieving high school students from historically under-served populations to experience the academic rigors and social climate on UNC-Chapel Hill’s campus. I came home singing camp songs and knew that I would definitely apply to UNC-Chapel Hill.

4. When I was accepted, I had to decide between UNC-Chapel Hill and Winston-Salem State University (“WSSU”), which offered me a scholarship and is my parents’ alma mater. One of the factors that helped me to choose UNC-Chapel Hill was that, after Project Uplift, I wanted to return to an environment in which I could be surrounded by and learn from people from different backgrounds. I wanted to be in an environment surrounded by a diverse group of people I could learn and grow with. I was looking for an environment like my childhood in Raleigh. While I was mindful of the fact that WSSU is a family school, and UNC-Chapel Hill was more expensive, I still chose to go to UNC-Chapel Hill because diversity was important to me. My twin brother chose to go to school at North Carolina A&T University, a historically black university (HBCU).

UNC-Chapel Hill Experience

5. I was overinvolved at UNC-Chapel Hill, but I thoroughly enjoyed all of my experiences. During my freshman year, I was a Class Council participant. I was a part of the Black Student Movement (“BSM”). I also was a member of the UNC-Chapel Hill Gospel Choir and became an Officer. I was a Residential Advisor (“RA”), and I participated in work study.

6. I was involved with the Diversity and Multicultural Affairs office (“DMA”) every year as a student volunteer, and during my sophomore year, I became a Student Administrative Staff Member to lead DMA programming. I worked as a Campus Visitation Coordinator with DMA and travelled with the former director of DMA, Terri

Houston, to the University of California, Los Angeles; Rice University; and the University of Florida. These were amazing experiences, and I learned about diversity initiatives at other schools. In my work with DMA, I tried to make sure that minority students and those from disadvantaged backgrounds knew that UNC-Chapel Hill, which is a selective institution, is still an option for them. I grew the most from my DMA experiences.

7. I was very naive as a young person, and I only thought about diversity in terms of race. I thought that if you looked like me, we probably had a lot in common and would get along. That myth was debunked at UNC-Chapel Hill, and I learned that was absolutely untrue.

8. I met my friend Sheena through DMA. She is an American-Indian from the Lumbee Tribe. She was from a rural background in Robeson County and spoke with a thick Southern accent. We are so different, but we are lifelong friends. She is an amazing woman, and we have so much in common that does not depend on the color of our skin, as she looks Caucasian. There is so much more that can bond and link you to another person than how you look. We had an “aha” moment when we found that we both love our grandmas, Southern cooking, cheesy jokes, and snack food. We are also both very family-oriented. We went to my first pow wow together, which was an amazing experience I may never have had without that friendship.

9. I had many experiences and interactions with students from different racial backgrounds at UNC-Chapel Hill. I can recall one specific instance where unfair

assumptions were made about me based on my race. Two Black female roommates and two White female roommates had a conflict with each other about noise and they sought a mediation session with me as an RA. The two White roommates accused the two Black roommates of being noisy. The White students did not want me to do the mediation because they felt I was too close to the Black roommates. I thought I was friendly to everybody; I am a jovial person and never meet a stranger. I think that I act like the same person, no matter who I am with. I personally felt the White students did not want me to facilitate the discussion because they did not think I could be fair to them because of my race. I pulled in my co-RA, a White female, to sit in with me on the mediation. We successfully worked through the issues, and I felt like the participants walked away feeling heard.

10. Diversity was very important in my courses and academic work as well. At UNC-Chapel Hill, I took a Sociology course that dealt with education. I recall thinking that the professor did a great job of choosing material for the course and helping us think through the material. The material addressed the development of policies like the welfare system and educational policies. It opened my mind to how politics and policy-making work. I learned that educational policies affect which kids get access to what kind of education, and it has a lot to do with socioeconomic status and race. I was fortunate to grow up as middle class, and I was not aware of welfare. The diversity of the students in that classroom made the course and its material more impactful and personal.

Compelling Interest in Diversity

11. I cannot overstate the importance of diversity at UNC-Chapel Hill. Coming to UNC-Chapel Hill and seeing people like Terri Houston, a Black female, running an entire department and Dean Harold Woodard, a Black male, in charge of the Center for Student Success and Academic Counseling was inspirational. I cannot overstate the importance of being a student of color and seeing these people have an amazing impact on the University. Diversity on campus gives people safe spaces in which to voice concerns and places where people can come for assistance.

12. If a Black woman is doing something, it gives that thing some validity to other Black women. While you may not have a shared identity in many ways, if you see someone who looks like you doing something, you think you can do the same thing. People are more likely to feel welcome and capable of achieving success if they see others like them succeeding. It is about having an example and a footprint to follow. This matters and this makes a difference, not just for people of color.

13. In college and in my post-college experiences working with students from disadvantaged backgrounds, I have seen first-hand the importance of having a meaningful representation of people from different racial and ethnic backgrounds at UNC-Chapel Hill. Seeing college students and college graduates of color gives students of color hope for their own futures and helps them to see themselves in college and succeeding.

14. When I did not make it through the final round of Teach for America, a friend sent me the job description for Carolina College Advising Corps (“Advising

Corps”). The Advising Corps aims to help low-income, first-generation, and under-represented students from North Carolina attend college by placing recent UNC-Chapel Hill graduates as college advisers in selected public high schools throughout the State. Advisers assist students with admission, financial aid, and scholarship applications.

15. I was part of the first cohort of the Advising Corps. I was placed in Greensboro for two years, and I advised two high schools where the student body was almost entirely comprised of students of color. Working with both Black and brown low-income students solidified the fact that I want to serve young people and families. My time with the Advising Corps was my most impactful career experience to this day.

16. I have continued to work in the area of college success and access. At the Emily K Center, I am working on the mission of propelling academically-focused, low-income K-12 students and graduates toward success in college through its K to College programs while also offering college information and advising support to any local high school student. I am grateful for the opportunity to use my education to better the lives of others.

Conclusion

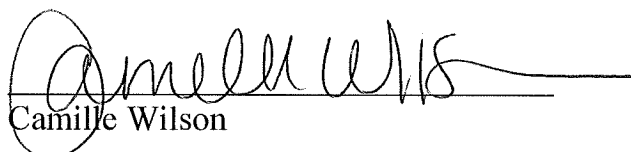
17. The diversity at UNC-Chapel Hill was an important reason that I chose to go to school there, and it contributed greatly to my own education. North Carolina is a very diverse state, and it is important that the flagship institution embrace diversity and provide an opportunity for students from all backgrounds and walks of life to attend. When young students see UNC-Chapel Hill students and graduates from similar

backgrounds, it opens their own minds to the possibility of attending a school like UNC-Chapel Hill (or college in general). UNC-Chapel Hill would be greatly diminished without its racial, ethnic, and socioeconomic diversity.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on:

July 12, 2017


Camille Wilson